

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SMART LOCAL 265 WELFARE FUND,)	
<i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 25 C 4776
vs.)	
)	JUDGE LASHONDA A. HUNT
R.G.H. HEATING & COOLING, INC.,)	
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, R.G.H. HEATING & COOLING, INC., an Illinois corporation, in the total amount of \$15,465.98, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,228.25.

On May 5, 2025, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 27, 2025. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Catherine M. Chapman

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 2nd day of June 2025:

Mr. Jonathan T. Linnemeyer, Registered Agent
R.G.H. Heating & Cooling, Inc.
1001 Warrenville Road, Suite 500
Lisle, IL 60532-4306

Ms. Sandra L. Shines, President
R.G.H. Heating & Cooling, Inc.
13802 Washington Street, A
Woodstock, IL 60098-9489

/s/ Catherine M. Chapman

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